

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RITA BROWNLEE, individually and on behalf)	
of all similarly situated individuals,)	
)	
Plaintiff,)	Case No. 1:21-cv-01428
v.)	
)	Hon. Sharon J. Coleman
ALLSTATE INSURANCE COMPANY, an)	
Illinois insurance company,)	
)	
Defendant.)	

**DEFENDANT ALLSTATE INSURANCE COMPANY’S AGREED AND UNOPPOSED
MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant Allstate Insurance Company (“Allstate”) by and through their attorneys and with the consent of Plaintiff’s counsel, hereby moves this Court to enter an Order granting Defendant Allstate a 45-day extension, up to and including May 24, 2021, to answer, move, or otherwise respond to Plaintiff’s Complaint, adjourn the initial status conference and status report until after the new Answer date, and vacate any technical defaults. In support of this motion, Allstate states the following:

1. This matter seeks damages for alleged violations of the Telephone Consumer Protection Act (“TCPA”). Plaintiff filed her Complaint on March 15, 2021. Allstate only recently discovered that it was served on March 19, 2021 and its deadline to answer or otherwise respond to Plaintiff’s Complaint was April 9, 2021.

2. An initial status hearing is currently scheduled for May 24, 2021 (ECF No. 6), with an initial joint status report due May 21, 2021 (ECF No. 5).

3. Allstate requests additional time to allow counsel to further investigate the facts underlying this matter and obtain a more complete factual background in order to respond to the allegations set forth in the Complaint.

4. Accordingly, Allstate seeks additional time, up to and including May 24, 2021, to answer or otherwise respond to Plaintiff's Complaint, and an adjournment of the initial status conference and status report until after the new Answer date.

5. This is Allstate's first request for an extension of time. Allstate's extension will not unduly delay these proceedings or prejudice the other parties.

6. Plaintiff's counsel has agreed to the relief requested herein.

WHEREFORE, for the reasons stated herein, Defendant Allstate requests (1) an enlargement of time up to and including May 24, 2021 to file its answer, move or otherwise respond to Plaintiff's Complaint, (2) an adjournment of the initial status conference and status report deadlines until after the new Answer date, (3) that the Court vacate any technical defaults; and (4) any other such relief as this Court deems just and proper.

Dated: April 14, 2021

Respectfully submitted,

Allstate Insurance Company

/s/Lewis S. Wiener

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CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2021, a copy of the foregoing DEFENDANT ALLSTATE INSURANCE COMPANY'S AGREED AND UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT was served via ECF to the following attorneys of record:

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